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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, *et al.*

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States, *et al.*,

Defendants.

Case No. 3:25-cv-03698-SI

**STIPULATED REQUEST BY  
DEFENDANTS FOR EXTENSION OF  
TIME TO RESPOND TO OPERATIVE  
COMPLAINT**

1 Pursuant to Civil Local Rules 6-2 and 7-12, the parties hereby stipulate and respectfully  
2 request that the Court extend the time for Defendants to respond to the operative complaint, to  
3 October 30, 2025. In support of this stipulation, the parties state as follows:

4 Plaintiffs filed an original complaint on April 28, 2025. ECF 1. Plaintiffs amended their  
5 complaint on May 14, 2025. ECF 100. The parties stipulated to a three-week extension of the  
6 deadline for Defendants to respond to Plaintiffs' amended complaint, to July 21, 2025. ECF 175.  
7 On July 21, 2025, Defendants filed a motion to dismiss Plaintiffs' amended complaint. ECF 216.  
8 The parties then stipulated to a two-week extension of Plaintiffs' deadline to respond to  
9 Defendants' motion to dismiss, until August 18, 2025. ECF 233. Briefing on the motion to dismiss  
10 was completed on August 25, 2025. ECF 252. On September 9, 2025, the District Court "denie[d]  
11 the motion with the exception that the claims against DOGE are dismissed with leave for plaintiffs  
12 to amend to clarify the DOGE allegations" by September 30, 2025. ECF 259 at 1, 13.

13 The parties now respectfully request that the Court extend the time for Defendants to  
14 respond to the operative complaint, to October 30, 2025. The proposed extension of time would  
15 conserve significant time and resources that would be expended to respond to the first amended  
16 complaint, which (in one week from today) will no longer be operative. The proposed extension  
17 of time would not affect other case deadlines, as a scheduling order in this case has not yet been  
18 entered.

19 In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under  
20 penalty of perjury that all signatories have concurred in the filing of this document. Further,  
21 pursuant to Civil Local Rule 6-2(a), undersigned counsel for Defendants has submitted a  
22 declaration in support of this stipulation.

23  
24 A proposed order is attached.  
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1 Dated: September 23, 2025

Respectfully submitted,

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1 Dated: September 23, 2025

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By: /s/ Tony LoPresti

*Attorneys for Plaintiff County of Santa Clara,*  
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**DECLARATION**

I declare, under penalty of perjury, that the factual assertions contained in this stipulation are true and correct to the best of my knowledge.

/s/ Marianne F. Kies  
Marianne F. Kies  
Trial Attorney